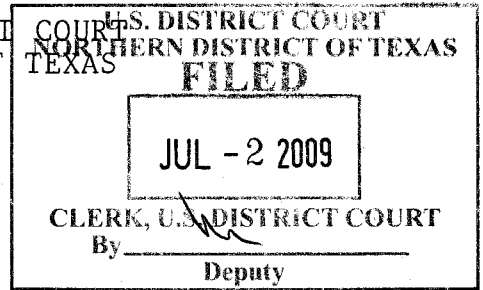


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ORIGINAL

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF  
DALLAS DIVISION



JANE DOES 1-3,  
(Plaintiffs)

v.

Civ. Action No. 3:08-CV-02189

SUNG BUM CHANG, et al  
(Defendants.)

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**MOTION TO SUPPRESS PLAINTIFFS' RESPONSE FOR RECONSIDERATION  
TO PROCEED ANONYMOUSLY OR A REQUEST TO COMPEL UNPUBLISHED CASELAW AND  
A REQUEST FOR EXTENTION TO REPLY**

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1. Plaintiffs' response dated June 25th, 2009, should be deemed untimely because they had originally requested an extension to their allowed response time to include affidavits from the self-alleged victims. Their response, however, contains no such affidavits. Instead, they rely on documents that they had previously filed with this Court; namely, the affidavits from Defendant's criminal cases. Because Plaintiffs fail to provide promised Affidavits', their response should be deemed untimely and moot.
2. Plaintiffs, instead, rely heavily on a United States State Department report on human trafficking. Reliance on such

report is wholly misplaced and solely intended to be unfairly prejudicial. As the Plaintiffs concede, Defendants have never been convicted of a human trafficking offense. (Response page 4). Therefore, any arguments about the human trafficking crimes of unrelated parties to this case is a waste of this Court's valuable time and resources. Accordingly, all such discussion should be held irrelevant and moot.

3. Plaintiffs' reliance on S. Chang's plea agreement to establish any facts is squarely misplaced because the voluntariness of that very plea agreement is in dispute in this Court. Surely, Defendants cannot be held liable for statements they agreed to unvoluntarily. Rather, the Plaintiffs' in this case bear the burden of proving the relevant facts. Our system of justice requires nothing less.
4. Defendants', also, humbly request that the Plaintiffs be required to forthwith provide Defendants with a copy of the unpublished caselaw that they rely upon in their filings. Like many other pro se litigants, Defendants lack access to such unpublished legal resources. Thus, they cannot intelligently nor adequately reply to the Plaintiffs' allegations. Surely, Plaintiffs' sole representation of the caselaw maybe fraught with errors. To ensure balanced/accurate representation of the caselaw, Defendants

humbly request this Court to order the Plaintiffs to forthwith produce/provide the unpublished caselaw relied upon by the Plaintiffs.

CONCLUSION

5. Defendants' humbly request this Honorable Court to: (1) reject the Plaintiffs' response as untimely and moot, alternatively, (2) Defendants request that the Plaintiffs be required to provide Defendants with a copy of the unpublished caselaw relied up-on by the Plaintiffs and that the Defendants be allowed an extension to reply within 20-days from the date when the Plaintiffs provide the unpublished caselaw, and (3) grant Defendants' any other relief that may be appropriate.

Respectfully Submitted,




Sum Bum Chang  
(Individually and on  
behalf of Club Wa)  
Reg. # 33473-177  
FCI Seagoville  
P.O. Box 9000  
Seagoville, TX 75159

Certificate of Service

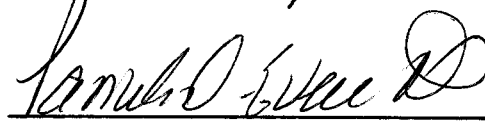
Certificate of Service

I, Sung Bum Chang, hereby certify that on 30th Day of June, 2009, I served a copy of the foregoing motion on (1) Office of the Clerk, United States District Court, 1100 Commerce - Room 1452, Dallas, TX 75242-1495; (2) Luis G. Zambrano, 2200 Ross Ave., Suite 2800, Dallas Texas 75201-2784.

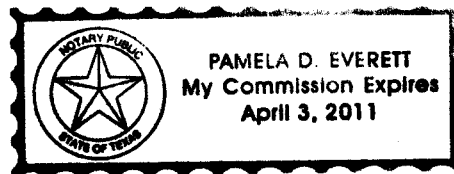
  
Sung Bum Chang

Notarization

SCRIBED AND SWORN TO BEFORE ME on the 30th Day of June, 2009.

  
Notary Service in and for  
the State of Texas

My Commission expires on: April 3, 2011



SUNG BUM CEANG  
REG. NO 33473 - 177  
FEDERAL CORRECTIONAL INSTITUTION  
P.O. BOX 9000  
SEACOVILLE, TX 75159 - 9000



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UNITED STATES DISTRICT COURT  
OFFICE OF THE CLERK  
NORTHERN DISTRICT OF TEXAS  
1100 COMMERCE - ROOM 1452  
DALLAS, TX 75242 - 1495

